

REMARKS/ARGUMENTS

Prior to the entry of this amendment, claims 15-28, 35-39, and 44-47 were pending in this application. No claims have been amended, no claims have been canceled, and claims 48-52 have been added herein. Therefore, claims 15-28, 35-39, and 44-52 are now pending in the application. Applicants respectfully request reconsideration of these claims for at least the reasons presented below.

35 U.S.C. § 103 Rejection, Hayes in view of Chen

Claims 15-28, 35-39 and 44-47 were previously rejected under 35 U.S.C. §103(a) as being unpatentable over U. S. Patent No. 6,105,066 of Hayes, Jr. (hereinafter "Hayes") in view of U. S. Patent No. 5,831,975 of Chen et al. (hereinafter "Chen"). The Applicants respectfully submit that the Office Action does not establish a *prima facie* case of obviousness in rejecting these claims. Therefore, the Applicants request reconsideration and withdrawal of the rejection.

In order to establish a *prima facie* case of obviousness, the Office Action must establish: 1) some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or combine their teachings; 2) a reasonable expectation of success of such a modification or combination; and 3) a teaching or suggestion in the cited prior art of each claimed limitation. See MPEP § 706.02(j). However, as will be discussed below, the references cited by the Office Action do not teach or suggest each claimed limitation. For example, neither reference, alone or in combination, teaches or suggests determining dynamic members of a group based on a rule that defines dynamic membership for that group, wherein the rule is stored in a dynamic rule attribute of an identity profile of the group.

Hayes "provides a common repository for configuration information for users and applets in a client-server environment." (Col. 4, lines 11-13) The system of Hayes "allows users

to roam, that is, to log-in from any computer in the system at any time and have it configured automatically at run time according to the preferences stored for the user at the server." (Col. 4, lines 14-17) Under Hayes, "the server stores a plurality of object-oriented end user applications for downloading to user stations and it further stores configuration preferences for the end user applications in the context of different groups and users." (Col. 4, lines 35-38) The "user and group preferences are stored as a tree hierarchy." (Col. 8, line 39) "All users belong to the AllUsers group; this group contains the default preferences for some or all user applets on the server." (Col. 8, lines 41-43) "If a user is a member of more than one group (another group in addition to AllUsers), then the groups are prioritized for the purpose of selecting the preferences for a given applet for that user." (Col. 8, lines 64-67) "When a user requests to run an applet the preferences are coalesced according to the group or groups to which the user belongs and the user applet is configured on the user desktop accordingly." (Col. 9, lines 7-11)

However, as noted in the final Office Action, Hayes does not disclose determining dynamic members of a group based on a rule that defines dynamic membership for that group, wherein the rule is stored in a dynamic rule attribute of an identity profile of the group. Rather, the memberships of Hayes are all static, i.e., explicitly defined by the administrator (col. 7, lines 13-19, col. 17, lines 55-56, col. 18, lines 29-34, col. 19, line 63-66, col. 20, lines 40-45) rather than determined based on a rule. Hayes does disclose a blanket policy of requiring all users to be members of the "AllUsers" group. However, such a blanket policy is no different than any other explicit definition of a user's group memberships. That is, this policy defines a static rather than a dynamic membership and cannot be reasonably interpreted as disclosing determining dynamic members of a group based on a rule that defines dynamic membership for that group. Furthermore, Hayes does not disclose such a rule being stored in a dynamic rule attribute of an identity profile of the group.

Chen relates to "a hierarchical multicast routing scheme in an ATM network architecture." (Col. 1, lines 9-10) More specifically, Chen "utilizes an extension to a core-based tree algorithm [where] instead of a single core node, core nodes are maintained in each peer-group and at each level of the hierarchy." (Col. 6, lines 54-57) Under Chen a "communications

network includes a plurality of nodes coupled to one another by links." (Col. 7, lines 6-8) That is, Chen teaches a list of links or pointers to nodes that are members of a group or level of the hierarchy. (See Figs. 1-5) Chen states that this "method supports dynamic membership to a multicast group, in that, nodes can join or leave the multicast group during the course of the multicast." (Col. 7, lines 55-58)

However, Chen does not teach or suggest dynamic membership as defined in the pending claims or accompanying detailed description. Specifically, Chen does not teach or suggest determining dynamic members of a group based on a rule that defines dynamic membership for that group. Rather, Chen teaches determining members of a group based only on the list of links or pointers to nodes that are members of that groups. That is, Chen teaches a linked list of nodes representing members of a group. Membership is determined by traversing the list but not based on a rule defining membership. Furthermore, Chen does not teach or suggest storing such a rule in a dynamic rule attribute of an identity profile of the group.

In an attempt to show support for such teachings in Chen, the final Office Action quoted column 7, lines 55-63 which state in total:

"The method supports dynamic membership to a multicast group, in that, nodes can join or leave the multicast group during the course of the multicast. Multiple senders to the multicast group are also supported, which enables realization of a true multipoint-to-multipoint connection. In addition, the multicast tree can be dynamically changed to reflect changes in the node and link states. The invention also has very low latency, that is, the join time of a new node is significantly small."

While this portion of Chen does disclose dynamic membership, it says nothing at all about determining dynamic members of a group based on a rule that defines dynamic membership for that group or storing such a rule in a dynamic rule attribute of an identity profile of the group. In fact, the cited portion of Chen says nothing at all about how nodes can join or leave the multicast group or how memberships can be determined. The remainder of Chen is equally devoid of any teaching of determining dynamic members of a group based on a rule that defines dynamic membership for that group or storing such a rule in a dynamic rule attribute of an identity profile

of the group. Rather, Chen teaches determining members of a group based **ONLY** on the list of links or pointers to nodes that are members of that groups, not based on a rule defining membership.

The combination of Hayes and Chen are no more relevant to the pending claims than either reference taken alone since neither reference, alone or in combination teaches or suggests determining dynamic members of a group based on a rule that defines dynamic membership for that group, wherein the rule is stored in a dynamic rule attribute of an identity profile of the group. Rather, the memberships of Hayes are all explicitly defined (i.e., static) while the memberships of Chen are determined based only on the list of links or pointers to nodes that are members of that groups.

Claim 15, upon which claims 16-28 depend, claim 35, upon which claims 36-39 depend, and claim 44, upon which claims 45-47 depend, each recite in part "determining dynamic members of a first group based on a rule that defines dynamic membership for said first group, wherein said rule is stored in a dynamic rule attribute of an identity profile of said first group." Neither reference, alone or in combination, teaches or suggests "determining dynamic members of a first group based on a rule that defines dynamic membership for said first group, wherein said rule is stored in a dynamic rule attribute of an identity profile of said first group." Rather, the memberships of Hayes are all explicitly defined (i.e., static) while the memberships of Chen are determined based only on the list of links or pointers to nodes that are members of that groups. For at least these reasons, claims 15-28, 35-39, and 44-47 should be allowed.

Similarly, new claim 48, upon which claims 49-52 depend, recites in part "an identity system adapted to determine dynamic members of a first group based on a rule that defines dynamic membership for said first group, wherein said rule is stored in a dynamic rule attribute of an identity profile of said first group." Neither reference, alone or in combination, teaches or suggests determining dynamic members of a first group based on a rule that defines dynamic membership for said first group, wherein said rule is stored in a dynamic rule attribute of an identity profile of said first group. Rather, the memberships of Hayes are all explicitly defined (i.e., static) while the memberships of Chen are determined based only on the list of links

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or pointers to nodes that are members of that groups. For at least these reasons, claims 148-52 should also be allowed.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

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Respectfully submitted,



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